

**FEDERAL MARITIME COMMISSION**

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**DOCKET NO.: 15-04**

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**CROCUS INVESTMENTS, LLC AND CROCUS, FZE**

**v.**

**MARINE TRANSPORT LOGISTICS, INC. AND ALEKSANDR SOLOVYEV  
a/k/a ROYAL FINANCE GROUP INC.**

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**COMPLAINANTS' MOTION FOR ENLARGEMENT OF TIME FOR FILING  
EXCEPTIONS TO INITIAL DECISION**

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Pursuant to Rule 228 of the Federal Maritime Commission's ("the Commission") Rules of Practice and Procedure, 46 C.F.R. § 502.228, Complainants Crocus Investments, LLC and Crocus, FZE hereby request an additional forty-five (45) day enlargement of the time to file exceptions to the Initial Decision served in this proceeding on June 17, 2016. Pursuant to Rule 71, Complainant's undersigned counsel has conferred by telephone with the Respondents' counsel regarding this request to enlarge time but the Respondents did not consent to the enlargement of time.

Good cause exists for an enlargement of time to file exceptions because:

1. The Complainants' officers are not proficient in English and Complainants need additional time to have the twenty-seven (27) pages of the Initial Decision translated into Russian so that their officers can fully understand the contents and assist their counsel in representing

them before the Commission. Such a voluminous translation will require at least two weeks to complete; and

2. Complainants and their undersigned counsel have come to a fundamental disagreement in this matter and it has become apparent that Complainants will need to seek new counsel to represent their interests going forward. Complainants' new counsel will need additional time to review the case file, read the Initial Decision, perform legal research, and draft the exceptions. Therefore, Complainants will need additional time to substitute attorneys and allow the new attorney to adequately represent their interests.
3. Rule 228 requires that the request for enlargement of time to file exceptions be submitted at least seven days before the existing deadline. The deadline to file the exceptions is twenty-two (22) days from the date of service and is July 9, 2016 but since the due date falls on a weekend (Saturday), pursuant to Rule 101 the actual due date is Monday, July 11, 2016. Therefore, this request, being filed on June 29, 2016 is within the requisite time frame.

WHEREFORE, Complainants Crocus Investments, LLC and Crocus, FZE request that the Commission grant this motion and enlarge the time for filing exceptions to the Initial Decision until August 25, 2016.

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served by mailing and emailing a copy to the persons listed below on June 29, 2016:

Stephen H. Vengrow

Eric Chang  
Montgomery, McCracken,  
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Dated: June 29, 2016

*s/Louiza Tarassova*

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